

FEB 16 2000

Mr. Alan Foltz, Permitting Manager
 Asbestos Recycling, Inc.
 1221 2nd Avenue North
 Kent, Washington 98032

Dear Mr. Foltz:

To clarify the issue regarding storage of PCBs at the PCB Demonstration Site on the Puget Sound Naval Shipyard (PSNS), Bremerton, Washington, the National Program Chemicals Division (NPCD) of the U.S. Environmental Protection Agency (EPA) grants Asbestos Recycling, Inc. (ARI) an approval, which extends through April 23, 2000, to demonstrate its mobile polychlorinated biphenyl (PCB) thermal disposal unit.

Condition 3(a)(2) of this approval authorizes ARI to store PCBs in quantities greater than ten 55-gallons drums, subject to submission of acceptable closure plan, closure cost estimate, and financial assurance for closure. ARI complied with these requirements. Therefore, ARI may transfer nineteen drums of PCBs to the PCB Demonstration site at the PSNS for storage for the purpose of demonstrating the ARI Asbestos Converter Unit's capability to remove and dispose of PCBs from asbestos containing material, soil simulants, soils, absorbents, and other solid and liquid wastes.

If you have any questions regarding this matter, please contact Hiroshi Dodohara at (202) 260-3959.

Sincerely,

Tony Baney, Chief
 Fibers and Organics Branch

HDodohara:hd/OPPT-NPCD-FOB/2-16-00/7404/260-3959/Rm ET837/"storage.wpd"
 FOB Chron:Reading File/DS File/Subject File
 PCB storage, demonstration approval, asbestos conversion, furnace

CONCURRENCES

SYMBOL	7404	7404						
SURNAME	Dodohara	Baney						
DATE	2/16/00	2/16/00						

Enclosures

cc: Dan Duncan
USEPA Region X

Cathy Massamino
USEPA Region X

Kathy Johnson
USEPA Region X

Gerry Sherell
US PSNS, Bremerton, WA

Bob Cipra
US PSNS, Bremerton, WA

Claude Williams
PSAPCA, Seattle, WA

3. Storage of PCBs: ARI intends to ship liquid PCBs from a permitted commercial storage facility to the PSNS for storage and disposal during the PCB Disposal Demonstration Test Burn. ARI may store for disposal, PCBs and PCB Items at concentrations of 50 ppm or greater subject to the following conditions:

- a. Storage in a Facility Complying with 40 CFR 761.65(b)(1): Pursuant to this demonstration approval, ARI may
 - (1) store, at any one time, PCBs and PCB Items in quantities up to 70 cubic feet for non-liquid material, 500 liquid gallons, or combined liquid and non-liquid PCBs up to ten 55-gallon drums and is not subject to the PCB Commercial Storage approval requirements at 40 CFR 761.65(d), or
 - (2) store PCBs and PCB Items in quantities greater than 70 cubic feet for non-liquid material, 500 liquid gallons, or combined liquid or non-liquid PCBs up to ten 55-gallon drums and is subject to the PCB Commercial Storage approval requirements at 40 CFR 761.65(d). These requirements include, in part, the submission of: a closure plan, a closure cost estimate, and financial assurance for closure.
- b. Storage in Facilities which Comply with 40 CFR 761.65(b)(2): Pursuant to this demonstration approval, ARI may store PCB and PCB Items in a facility which is:
 - (1) permitted under EPA under Section 3004 RCRA or has achieved interim status under Section 3005 of RCRA,
 - (2) permitted by a State authorized under Section 3006 of RCRA,
 - (3) approved or regulated under a State PCB waste management program no less stringent than the requirements at found in this Part,
 - (4) subject to a TSCA Coordinated Approval pursuant to 40 CFR 761.77 which includes provisions for PCB storage, or
 - (5) permitted under a TSCA waste management approval pursuant to 40 CFR 761.61© and 761.61(c).
- c. Storage in an Area which Does not Comply with 40 CFR 761.65(b): Pursuant to this demonstration approval, ARI may temporarily store for not more than thirty days the following PCB Items in a facility which does comply with provisions under 40 CFR 761.65(b) provided that a notation is attached to the PCB Item or a PCB Container continuing the PCB Item indicating the date the item was removed from service or generated as a waste,

- (1) Non-Leaking PCB Articles and PCB Equipment,
 - (2) Leaking PCB Articles and PCB Equipment provided the items are placed in a non-leaking PCB container that contains sufficient sorbent material to absorb remaining liquid PCBs in the item,
 - (3) PCB Containers containing non-liquid PCBs such as contaminated soil, rags and debris,
 - (4) PCB containing liquids PCBs at concentrations of ≥ 50 ppm, provided a Spill Prevention, Control and Countermeasure Plan has been prepared for the temporary storage area in accordance with part 112 of this chapter and the liquid PCB waste is in Packaging authorized in the DOT Hazardous Material Regulations at 40 CFR Parts 171 through 180 or stationary bulk storage tanks (including rolling stock such as, but not limited to, tanker trucks, as specified by DOT.
- d. Any PCB material not disposed of or meeting the destruction efficiency criteria under this demonstration approval shall be disposed of at EPA approved facilities, or ARI may elect to dispose of the remaining PCB material following disposal procedures outlined in Condition 10, Interim Operations.